

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110  
NEW YORK, NEW YORK 10118  
TEL (212) 763-0883 | FAX (212) 564-0883  
WWW.KAPLANHECKER.COM

DIRECT DIAL 929.294.2540  
DIRECT EMAIL jdabbs@kaplanhecker.com

October 16, 2020

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

**RE: United States v. Arguedas et al. (Denise Bullock), 20 Cr. 135 (JMF)**

Dear Judge Furman:

We write respectfully to seek permission for defendant Denise Bullock to make several short trips from her home incarceration. This requested travel would allow Ms. Bullock to obtain an EBT card to buy food, visit with her children and immediate family for upcoming holidays, and meet with her lawyers at their office. Ms. Bullock and her counsel would coordinate all of these trips with Pretrial Services should Your Honor grant these requests.

On September 15, 2020, Your Honor granted Ms. Bullock's motion for conditional pretrial release and imposed her proposed condition of home incarceration. The Court's order allows Ms. Bullock to leave freely for "necessary medical services," and provides that "[a]ll other leave from the residence must be submitted through defense counsel for the Court's approval." (ECF No. 224 at 1-2.)

Ms. Bullock respectfully requests that the Court permit her to make the following trips:

1. To visit, as soon as reasonably practicable, an office of the New York City Human Resources Administration (or other appropriate location) to obtain or refill an EBT card. The government has indicated it does not object to this request.
2. To visit her mother's residence in Manhattan from November 23-30, 2020 (for the Thanksgiving holiday and her son's November 30 birthday) and from December 24-January 1, 2021 (for the Christmas holiday through New Year's Day). Her mother is a co-signer of her bond in this case, and the family will make arrangements for all four of her children to visit with Ms. Bullock for the holidays at her mother's Manhattan residence, should Your Honor grant this request. The government has

KAPLAN HECKER & FINK LLP

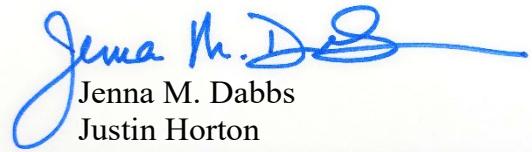
indicated it defers to Pretrial Services on this request. On October 16, 2020, we spoke with Pretrial Specialist Bernisa M. Mejia, who is supervising Ms. Bullock during her pretrial release. While Specialist Mejia does not have discretion to consent to overnight visits for supervisees under home incarceration, she permitted us to relay that Ms. Bullock “is doing extraordinarily well” under her supervision.

3. To attend a legal meeting at our offices in Manhattan before the upcoming November 2 conference in this case. The government indicated it does not object to this request.

Finally, we understand Your Honor’s September 15 order to require leave of Court before we can arrange for legal meetings with Ms. Bullock at our offices. (See ECF No. 224 at 1-2 (“All other [non-medical] leave from the residence must be submitted through defense counsel for the Court’s approval”).) We respectfully request that Your Honor modify the September 15 order to the limited extent of permitting us to arrange such visits in coordination with Pretrial Services but without leave of Court. The government has indicated that it does not object to this request.

Thank you for your consideration of this matter.

Respectfully submitted,



Jenna M. Dabbs  
Justin Horton

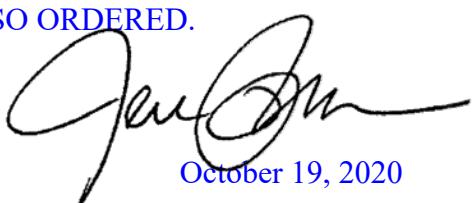
Brandon C. Thompson  
KAPLAN HECKER & FINK LLP  
350 Fifth Avenue, Suite 7110  
New York, New York 10118  
Telephone: (212) 763-0883  
Facsimile: (212) 564-0883  
jdabbs@kaplanhecker.com  
jhorton@kaplanhecker.com  
bthompson@kaplanhecker.com

*Counsel for Denise Bullock*

cc: AUSAs Danielle Sassoon, Andrew Chan, and Brandon Harper (via ECF)  
PSO Bernisa Mejia (via email)

Application DENIED as to Item #2, which is inconsistent with the concept of home incarceration. Application GRANTED in all other respects. The Clerk of Court is directed to terminate Doc.#241.

SO ORDERED.



Jan B.  
October 19, 2020